

LARISSA HARPER HAIRGROVE, )  
)  
)  
Plaintiff, )  
)  
v. )  
)  
CITY OF SALISBURY, DOWNTOWN )  
SALISBURY, INC. and LANE BAILEY )  
In his individual and official capacity, )  
)  
Defendants. )  
)

Defendant DOWNTOWN SALISBURY, INC. (“DSI”) hereby moves the Court to pursuant to Rule 56 of the Federal Rules of Civil Procedure, for summary judgment on Plaintiff’s remaining claims against it. Specifically, DSI seeks summary judgment on Plaintiff’s claim for post-employment retaliation under Title VII and for wages and overtime pursuant to the North Carolina Wage and Hour Act. On the basis of the matters in the record, deposition testimony, affidavits, documents, the items filed with and attached to DSI’s Memorandum of Law in Support of Summary Judgment, and applicable law, there are no genuine issues of material fact in dispute such that DSI is entitled to judgment as a matter of law on each of the Plaintiff’s claims. The bases for this Motion are set forth in more detail in the DSI’s Memorandum of Law in Support of Summary Judgment filed contemporaneously herewith.

WHEREFORE, DSI moves the Court for summary judgment in its favor on all of the Plaintiff's claims against it.

This the 4<sup>th</sup> day of April, 2023.

*s/G. Bryan Adams, III*  
G. Bryan Adams, III (N.C. Bar No. 17307)  
VAN HOY, REUTLINGER, ADAMS & PIERCE,  
PLLC  
737 East Boulevard  
Charlotte, North Carolina 28203  
Telephone: 704-375-6022  
Fax: 704-375-6024  
Email: [bryan.adams@vraplaw.com](mailto:bryan.adams@vraplaw.com)

**ATTORNEYS FOR DEFENDANT DOWNTOWN  
SALISBURY, INC.**

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that this MOTION FOR SUMMARY JUDGMENT was filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following counsel of record for the Plaintiff as follows:

Valerie Bateman  
June Allison  
NEW SOUTH LAW FIRM  
209 Lloyd Street, Ste. 350  
Carrboro, NC 27510  
Email: [valerie@newsouthlawfirm.com](mailto:valerie@newsouthlawfirm.com)  
[june@newsouthlawfirm.com](mailto:june@newsouthlawfirm.com)

and to counsel for Defendants City of Salisbury and Lane Bailey as follows:

Patrick Flanagan  
Cranfill Sumner LLP  
2907 Providence Road, Suite 200  
Charlotte, NC 28211  
Email: [phf@cshlaw.com](mailto:phf@cshlaw.com)

This 4<sup>th</sup> day of April, 2023.

*s/G. Bryan Adams, III*  
G. Bryan Adams, III  
N.C. Bar No. 17307  
VAN HOY, REUTLINGER, ADAMS & PIERCE, PLLC  
737 East Boulevard  
Charlotte, North Carolina 28203  
Telephone: 704-375-6022  
Fax: 704-375-6024  
Email: [bryan.adams@vraplaw.com](mailto:bryan.adams@vraplaw.com)

**ATTORNEYS FOR DEFENDANT DOWNTOWN  
SALISBURY, INC.**